OPERATION PLAN

FOR

HAZARDOUS WASTE

TRENT TUBE DIVISION
COLT INDUSTRIES
FULLERTON OPERATION

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TRENT TUBE DIVISION - COLT INDUSTRIES OPERATION PLAN FOR HAZARDOUS WASTE, STORAGE, AND/OR TREATMENT FACILITY WHICH INVOLVES CONTAINERS AND TANKS.

I FACILITY IDENTIFICATION

1. FACILITY

Trent Tube Division, Fullerton Operation
2100 East Orangethorpe Avenue
Orange County
Fullerton, California 92634

EPA NUMBER

CAD 008325110

MAILING ADDRESS

P.O. Box 3068
Fullerton, California 92634

TELEPHONE NUMBER

(714) 526-5522

OPERATOR AND OWNER OF FACILITY AND LAND

Colt Industries Operating Corporation
430 Park Avenue
New York, New York 10022

Telephone Number (212) 940-0400

CONTACT PERSONNEL AT FACILITY

Harry L. Murphy - Manager of Quality Assurance
Steve Cornell - Maintenance Superintendent

PREPARER OF OPERATION PLAN

Based on DHS instructions of February 3, 1983.

Harry L. Murphy - Manager of Qaulity Assurance

CERTIFICATION

I certify under penalty of law that I have personnally examined and am familiar with the information submitted in this operation plan and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

D.R. Gehr

Vice President

August 9, 1983
Date

D.R. Gehr
Trent Tube Division
Colt Ind. Operating Corp.

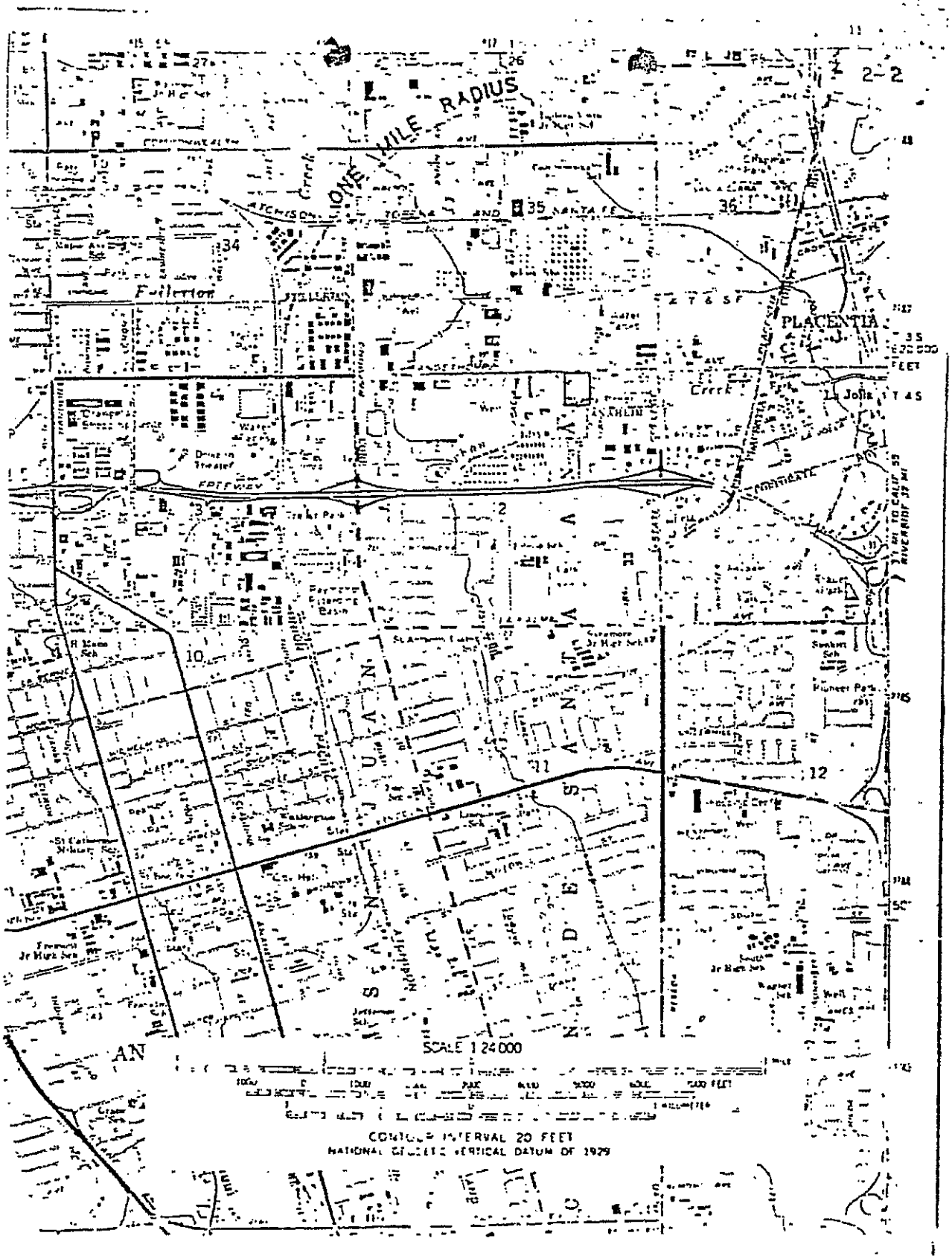
II FACILITY INFORMATION

1. Maps of Facility

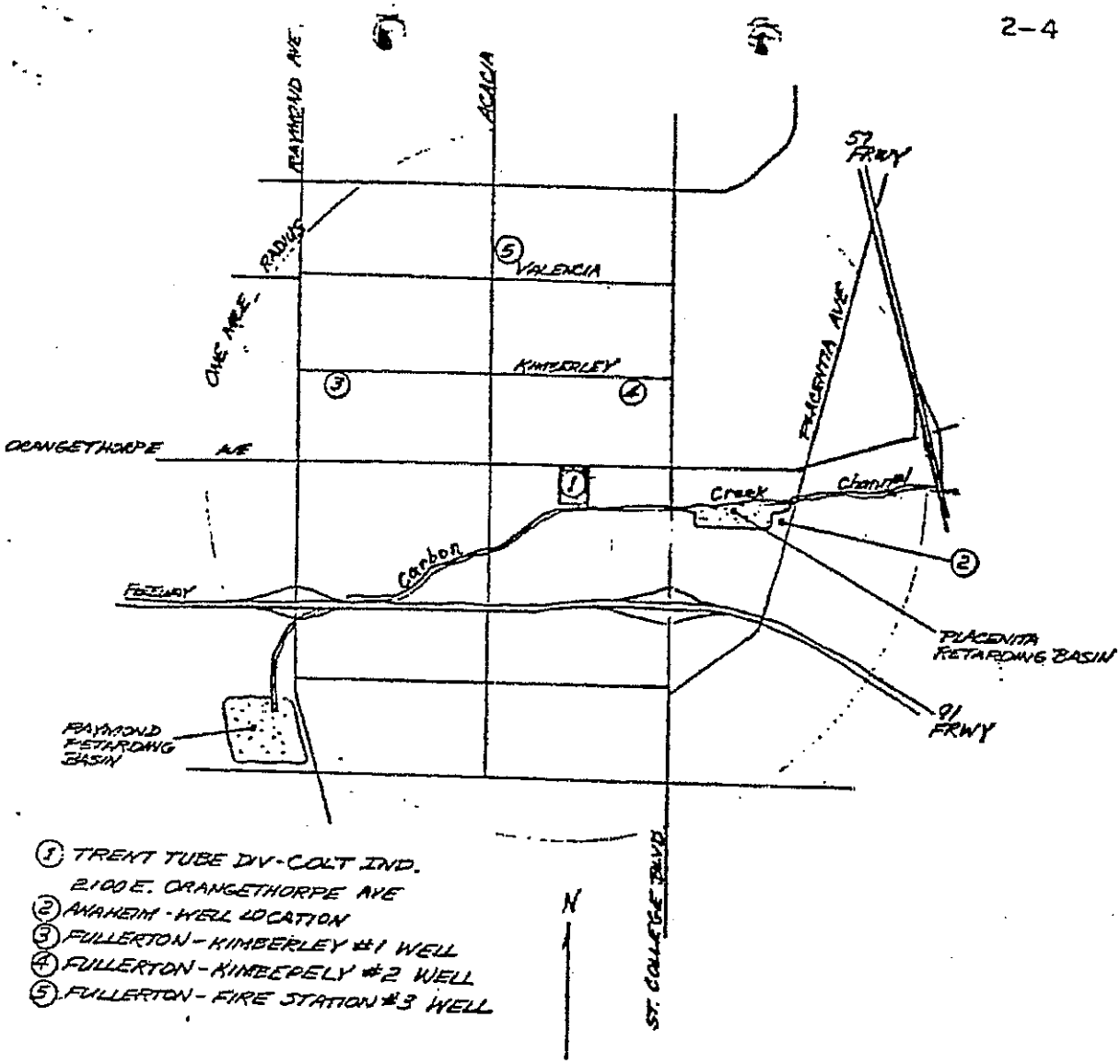
   Topographic (1:2400 Scale)
   Topographic (1:2400 Scale)
   Wells, Surface Water & Aquducts
   Treatment & Storage Areas
   Topographic, Facility Only, Drainage
   Utility Lines

2. Photographs of Facility

3. Associated Information

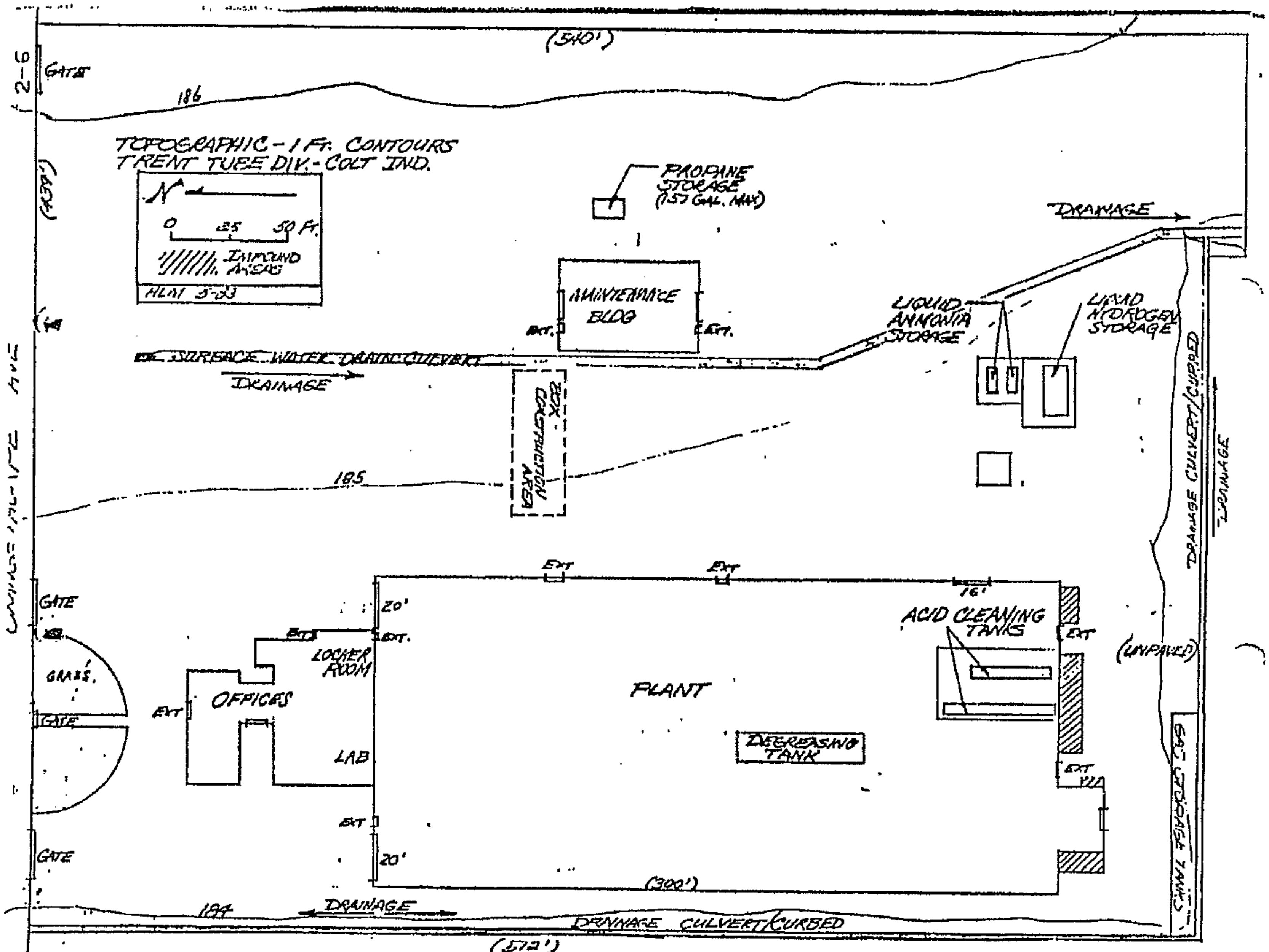

ONE MILE RADIUS
Fullerton
PLACENTIA
FREEWAY
SCALE 1:24000
CONTOUR INTERVAL 20 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

CRU 00184



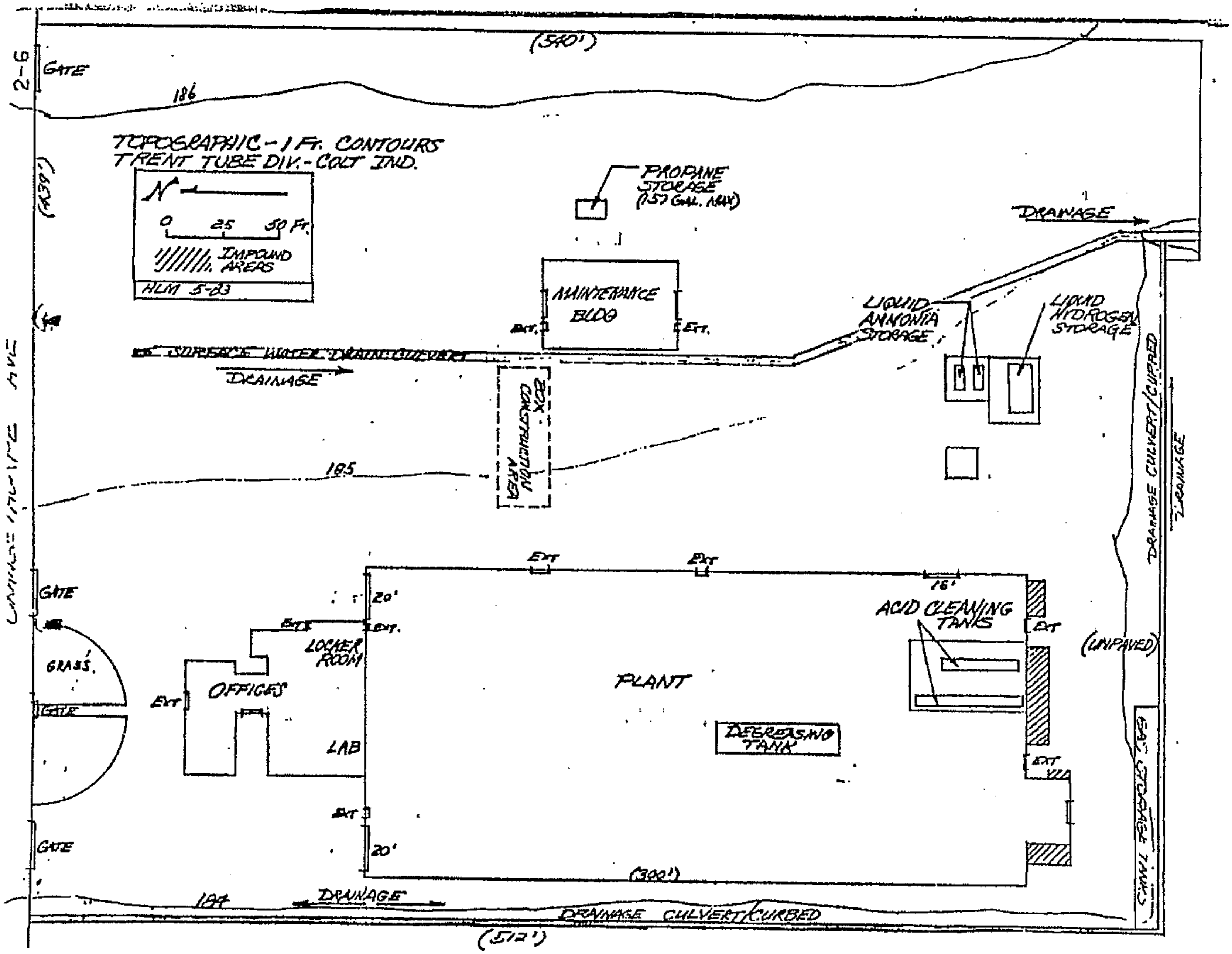
1. TRENT TUBE DIV-COLT IND. 2100 E. ORANGETHORPE AVE
2. ANAHEIM - WELL LOCATION
3. FULLERTON - KIMBERLEY #1 WELL
4. FULLERTON - KIMBERELY #2 WELL
5. FULLERTON - FIRE STATION #3 WELL

WELL, CREEK AND RETARDING BASIN LOCATIONS WITHIN ONE MILE RADIUS

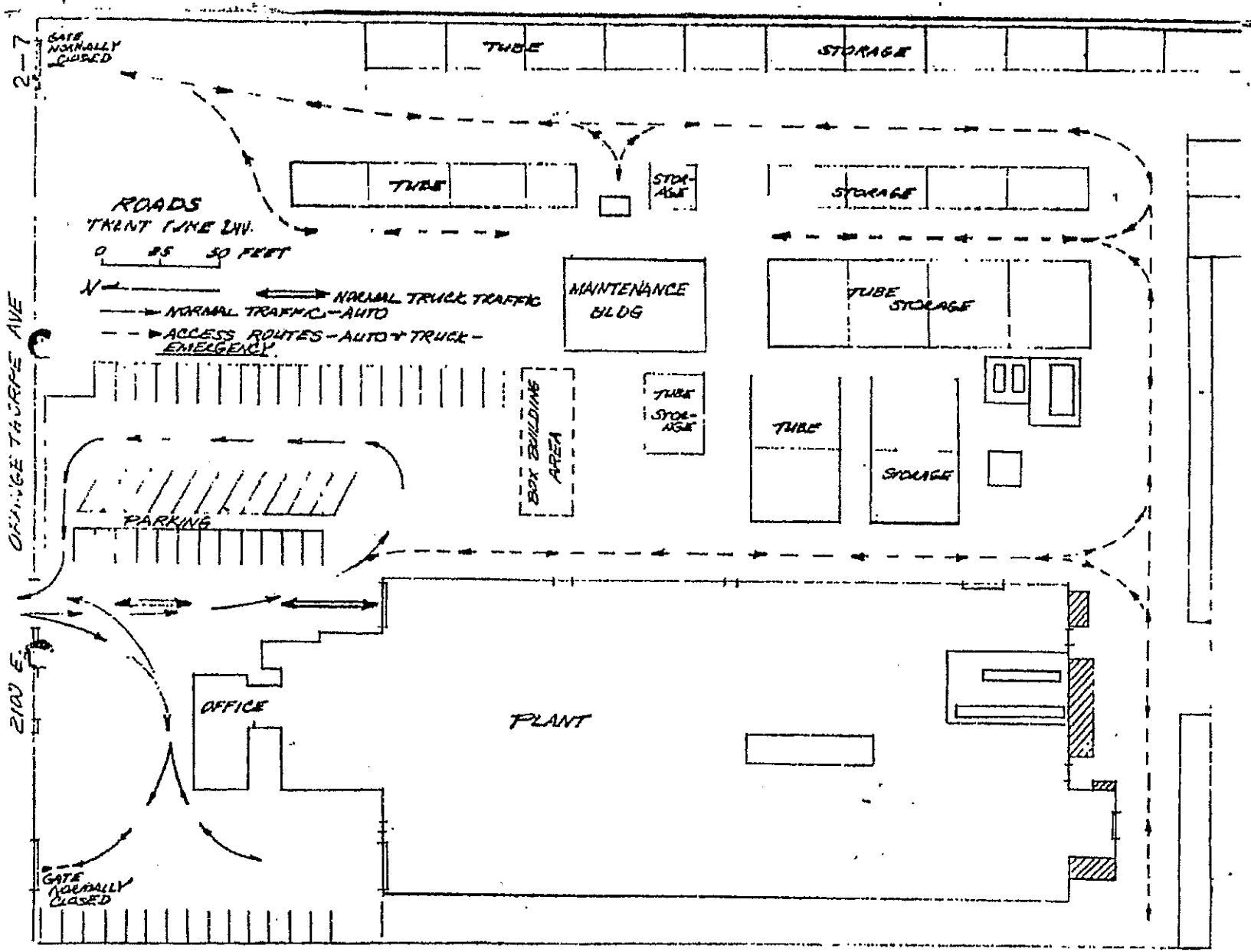


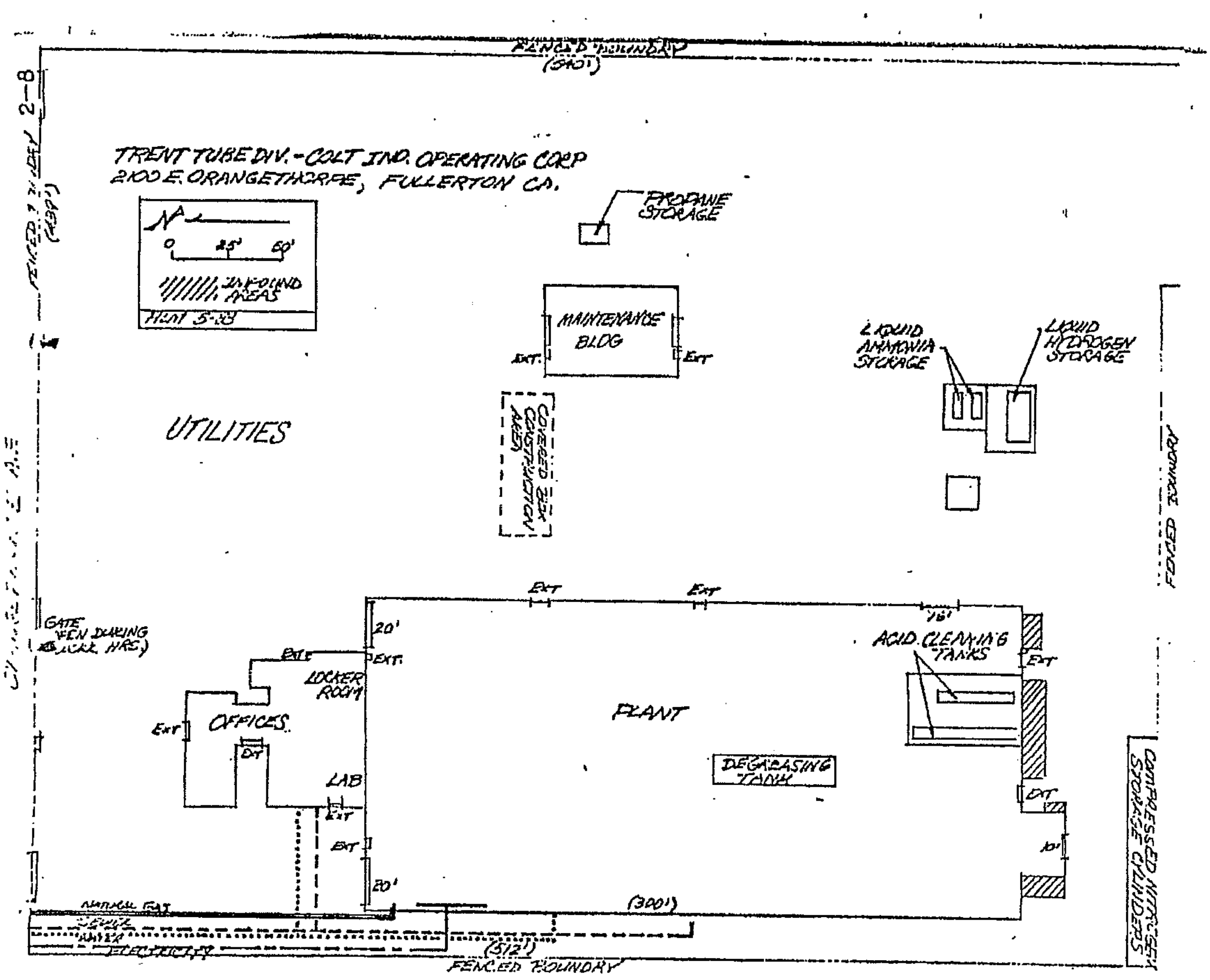
TOPOGRAPHIC - 1 FT. CONTOURS
TRENT TUBE DIV. - COLT IND.
(540')
GATE
186
N
0 25 50 FT.
IMPOUND AREAS
PROPANE STORAGE (157 GAL. MAX)
DRAINAGE
MAINTENANCE BLDG
EXT.
EXT.
LIQUID AMMONIA STORAGE
LIQUID HYDROGEN STORAGE
SURFACE WATER DRAIN CULVERT
DRAINAGE
BOX CONSTRUCTION AREA
185
DRAINAGE CULVERT/CURBED
DRAINAGE
EXT
EXT
16'
GATE
20'
EXT
EXT.
LOCKER ROOM
ACID CLEANING TANKS
EXT
(UNPAVED)
GRASS
GATE
EXT
OFFICES
PLANT
DEGREASING TANK
LAB
EXT
GAS STORAGE TANKS
EXT
GATE
20'
(300')
184
DRAINAGE
DRAINAGE CULVERT/CURBED
(512')

CRU 00186


TOPOGRAPHIC - 1 FT. CONTOURS
TRENT TUBE DIV. - COLT IND.
N
0 25 50 FT.
IMPOUND AREAS
HLM 5-83
(540')
GATE
186
(439')
PROPANE STORAGE (157 GAL. MAX)
DRAINAGE
MAINTENANCE BLDG
EXT.
EXT.
LIQUID AMMONIA STORAGE
LIQUID HYDROGEN STORAGE
SURFACE WATER DRAIN CULVERT
DRAINAGE
BOX CONSTRUCTION AREA
185
DRAINAGE CULVERT/CURBED
DRAINAGE
EXT
EXT
16'
20'
GATE
ACID CLEANING TANKS
EXT
EXT.
LOCKER ROOM
GRASS
(UNPAVED)
OFFICES
EXT
PLANT
GATE
LAB
DEGREASING TANK
EXT
EXT
GAS STORAGE TANKS
20'
GATE
(300')
184
DRAINAGE
DRAINAGE CULVERT/CURBED
(512')

CRU 00187


GATE NORMALLY CLOSED
TUBE STORAGE
TUBE
STOR-AGE
STORAGE
ROADS
TRENT TUBE DIV.
0 25 50 FEET
N
NORMAL TRUCK TRAFFIC
NORMAL TRAFFIC - AUTO
ACCESS ROUTES - AUTO + TRUCK - EMERGENCY
MAINTENANCE BLDG
TUBE STORAGE
BOX BUILDING AREA
TUBE STOR-AGE
TUBE
STORAGE
PARKING
ORANGE TAURPE AVE
21ST ST
OFFICE
PLANT
GATE NORMALLY CLOSED


TRENT TUBE DIV. - COLT IND. OPERATING CORP
2100 E. ORANGETHORPE, FULLERTON CA.
0 25' 50'
IMPOUND AREAS
FENCED BOUNDARY
(540')
PROPANE STORAGE
MAINTENANCE BLDG
EXT.
EXT
LIQUID AMMONIA STORAGE
LIQUID HYDROGEN STORAGE
UTILITIES
COVERED BOX CONSTRUCTION AREA
FENCED BOUNDARY
EXT
EXT
75'
20'
EXT.
GATE
ACID CLEANING TANKS
LOCKER ROOM
OFFICES
PLANT
LAB
DEGREASING TANK
EXT
COMPRESSED NITROGEN STORAGE CYLINDERS
20'
(300')
NATURAL GAS
SEWER
WATER
ELECTRICITY
(512')
FENCED BOUNDARY
2-8

CRU 00189

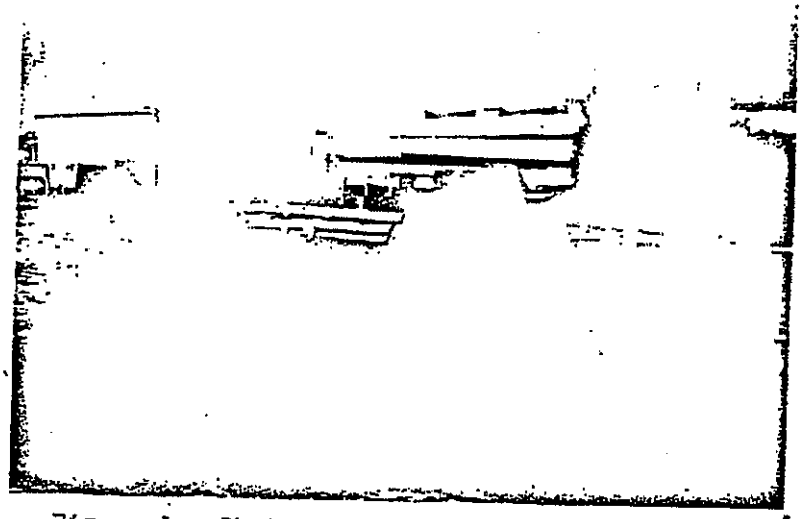


Figure 1 - Photograph from northeast corner of property looking southwest, showing main plant (right) and maintenance building (left).

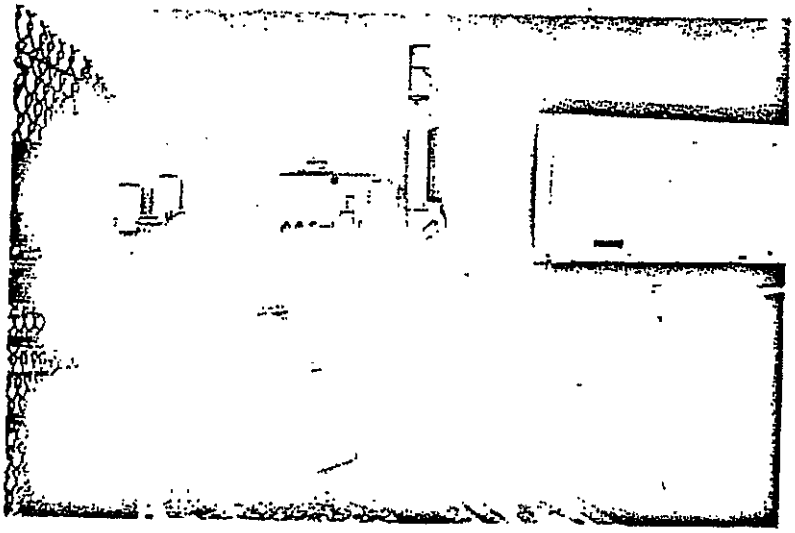


Figure 2 - Photograph taken from south end of property looking west. Shows south end (rear) of plant and locations of three of four impound areas. Building and white tanks (upper left) are on adjacent non-owned property.

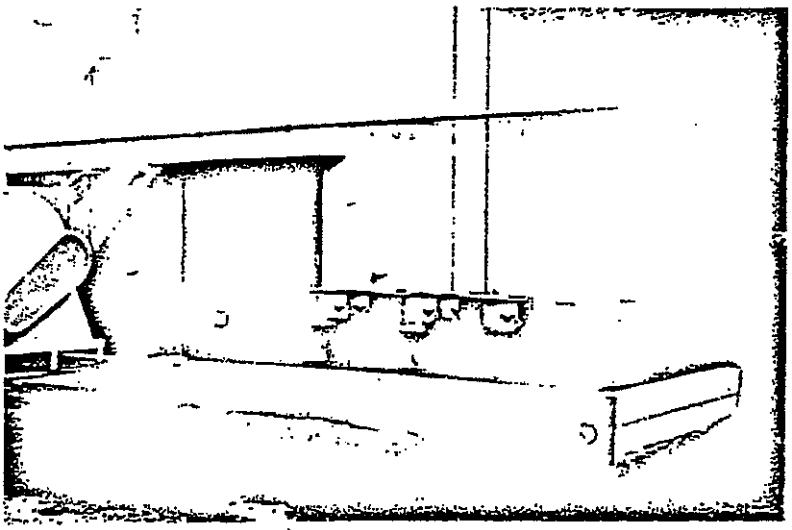


Figure 3 - Impound located at southeast corner of the plant used to store concentrated acids.

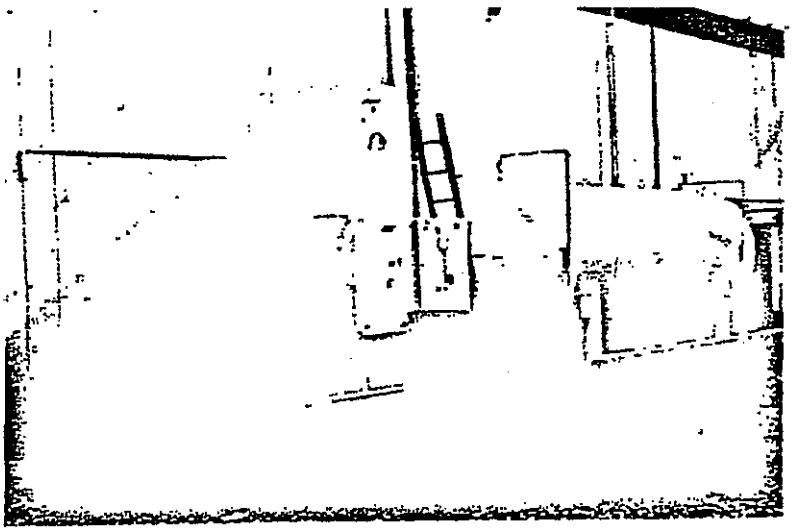


Figure 4 - Impound located at south end, center of plant. Tanks from left to right, store waste oil, waste detergent, unused 1,1,1 trichloroethane, kerosene and 1,1,1 trichloroethane. Drums contain kerosene to be stored in the kerosene tank.

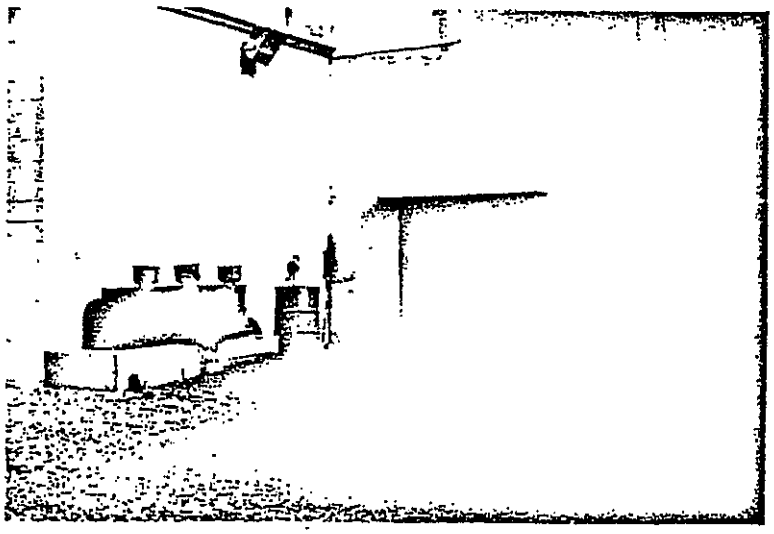


Figure 5 - Waste collection impound at south end of facility. Impounded drums contain waste 1,1,1 trichloroethane, waste kerosene, and waste mineral spirits.

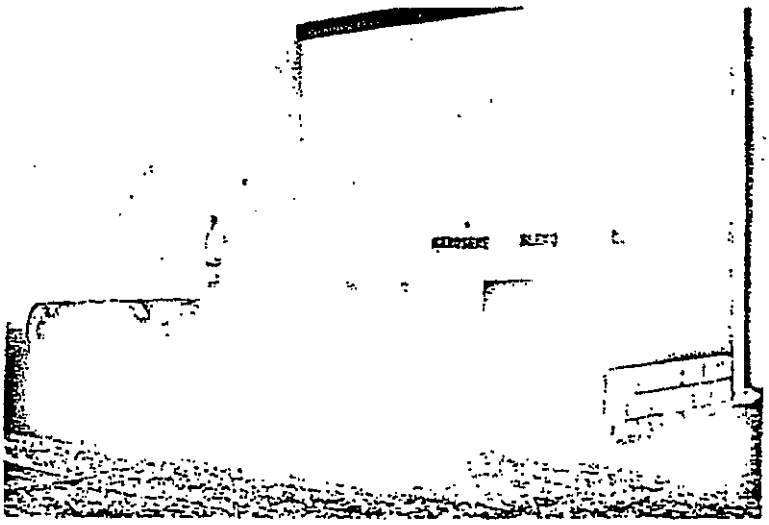


Figure 6 - Waste storage impound at southwest corner of plant. Non-impounded drums are empty.

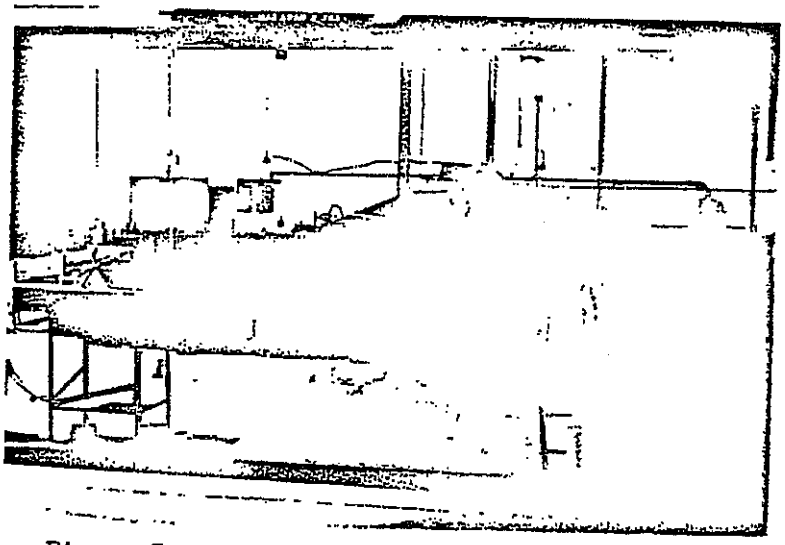


Figure 7 - Acid cleaning area inside the plant at the south end. Covered tank (right) and the center tank contain nitric plus hydrofluoric acid solutions. The two tanks at the left are water rinse tanks.

3. ASSOCIATED INFORMATION

3.1 Legal Description of Property

3.1.1 Parcel Map Number - 073-131-06

3.1.2 SEC 2 T 4 R 10 N 3.90 AC E 4.50 AC N 20 AC FRACT W½ NE ¼-EX-ST

3.2 Estimated Volume of Traffic

3.2.1 Automobile - 70 per working day.

3.2.2 Trucks - 6 common carriers (product shipments or deliveries)

3.2.3 Waste Haulers - 1 every two months to remove wastes.

3.2.4 Other - 6 per working day.

3.3 Access Road Characteristics

3.3.1 Asphault paved (refer to page 2

Northwest and north center entrances, parking lots and road adjacent to plant running north and south.

3.3.2 Gravel - East and west road at south end of plant and routes in storage yard.

3.3.3 Dirt - Northeast gate and zone up to storage areas. Will not support traffic when ground is water saturated.

IV RELATIONSHIP OF FACILITY TO 100 YEAR FLOOD PLAN

1. Data Source

1.1 Federal Emergency Management Agency
Flood Insurance Rate Map
City of Fullerton
Orange County, Panel 2 of 2
Community Panel Number 060219 0002D
Map Revised - April 5, 1983

2. Flood Map

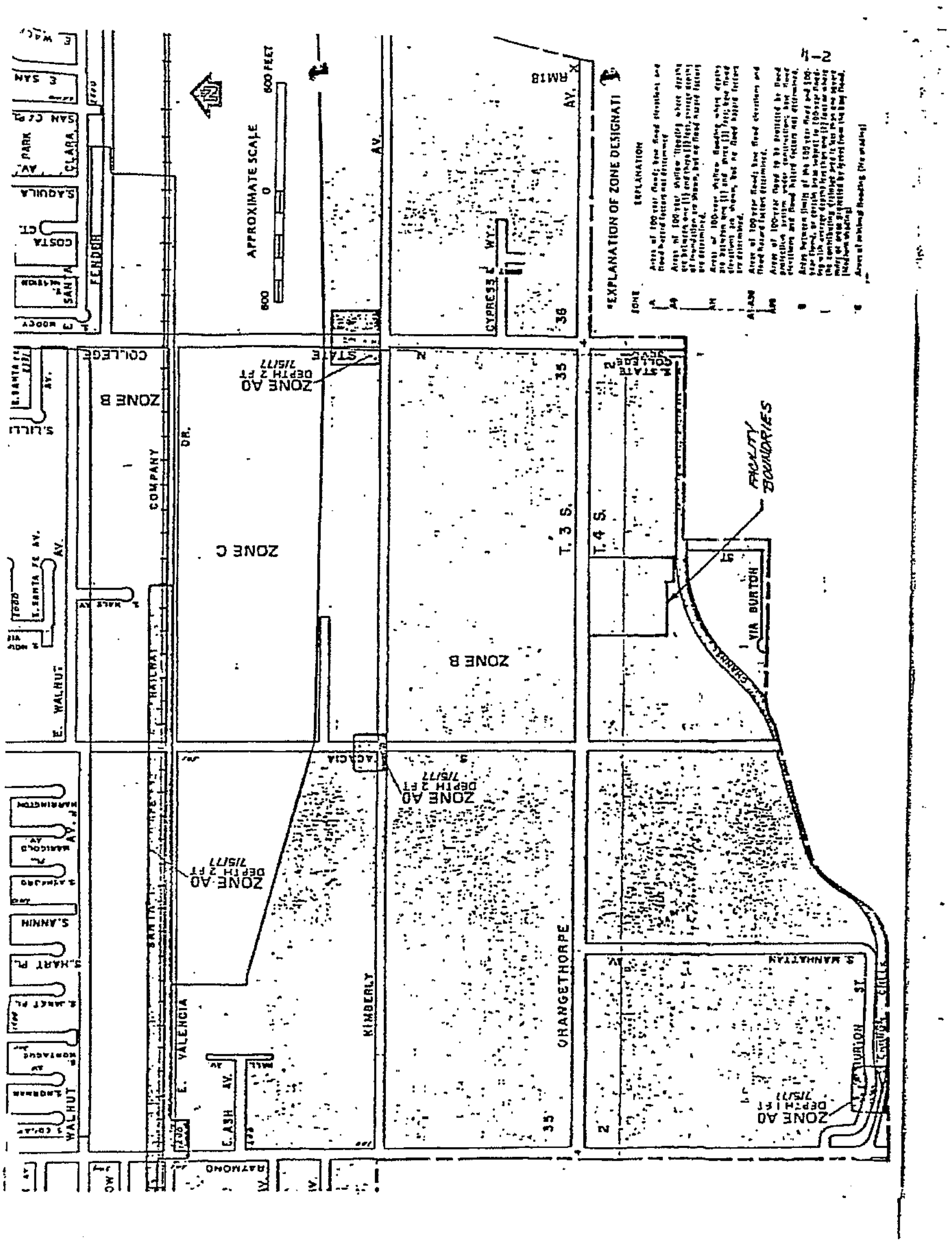
See next page.

3. 100 Year Flood Level

3.1 Less than twelve inches.

4. Analysis

4.1 At less than a 12" level, flood waters do not pose a threat to release of hazardous wastes.


4-2
EXPLANATION OF ZONE DESIGNATI
APPROXIMATE SCALE
600 FEET
ZONE C
ZONE B
ZONE AO
DEPTH 2 FT
7/15/77
ZONE AO
DEPTH 1 FT
7/15/77
FACILITY BOUNDARIES
T. 3 S.
T. 4 S.
ORANGETHORPE
KIMBERLY
VALENCIA
COMPANY
STATE COLLEGE
VIA BURTON
CYPRESS
ACACIA
RM18

V CHARACTERISTICS OF HAZARDOUS WASTES HANDLED

1. Neutralized Pickle Liquor - EPA Number D007
(DOT UN1760; Corrosive Liquid, n.o.s.)

1.1 This is a mixed nitric plus hydrofluoric acid bath used for cleaning and descaling of stainless steel tubing.

1.2 Solution is contained in two process tanks of 2000 gallons each.

1.3 Spent acid is neutralized with ammonia within the process tanks prior to disposal.

1.4 Neutralized solution is vacuumed to a tank truck and disposed of in liquid form in a Class 1 landfill.

1.5 Disposal occurs approximately every 3 to 5 months. Yearly volume is 7,000 to 10,000 gallons.

1.6 Neutralized solution is toxic and has the following properties and analysis: pH 6-8 Sp. Gr. 1.02 to 1.08

Analysis:		
	Chromium (+6)	2.0/600 ppm
	Chromium (+3)	400/870 ppm
	Nickel	250/1300 ppm
	Ammonium Bifluoride	0/1000 ppm
	Ammonium Fluoride	2/3%
	Ammonium Nitrate	6/12%
	Water	Balance

1.7 The waste is always checked for pH and specific gravity prior to hauling for disposal. pH is checked to determine the point at which the waste is no longer corrosive. Specific gravity is checked to verify the weight of material disposed of. At least once per year the waste is chemically analyzed by an independent laboratory.

1.8 The neutralized waste is sampled at all depths via a straight glass sampling tube.

2. Neutralized Alkaline Cleaner - EPA Number NA
(DOT UN1760; Corrosive Liquid, n.o.s.)

2.1 This alkaline material is used to clean floors.

2.2 Waste containing entrained dirt and oil is stored in a 200 gallon tank. It is neutralized prior to disposal.

2.3 Neutralized waste is vacuumed to a tank truck for disposal in a Class 1 landfill.

2.4 Disposal occurs every one to three months. Total yearly volume is 800/1400 gallons.

2.5 This waste is toxic and has the following properties and analysis: pH 6-8

Analysis:	Sodium Nitrate	4/10%
	Entrained oil & dirt	2/5%
	Water	Balance

2.6 The waste is neutralized and checked for pH to render it noncorrosive.

3. Waste Oil - EPA Number NA
(DOT UN1268; Combustible Liquid)

3.1 Oil is used as a lubricant in cold drawing of tubing and for general lubrication.

3.2 The waste oil is contained in a steel tank of 200 gallons maximum capacity.

3.3 Disposal occurs at one to three month intervals. Yearly volume is approximately 300 gallons.

3.4 Waste is vacuumed to a tank truck and disposed of in a Class 1 landfill.

3.5 The waste is not analyzed but contains the following constitutents:

Petroleum products	90%
Dirt and sludge	10%

4. Neutralized Conversion Coating - EPA Number NA
(DOT UN1760; Corrosive Solution, n.o.s.)

4.1 A chemical conversion coating is applied to titanium tubing prior to cold drawing. Without this coating the titanium welds to to the tooling.

4.2 The spent solution, an acid plus salt additives, is neutralized with ammonia prior to disposal.

4.3 Neutralization occurs within the process tank.

4.4 The neutralized solution is vacuumed to a tank truck for disposal in a Class 1 landfill.

4.5 Disposal occurs as the need arises to recharge the process tank with fresh solution. Yearly waste volume is 400/800 gallons.

4.6 Neutralized solution is toxic and has the following properties and analysis: pH 6-8

Analysis:	Ammonium Phosphate	1/2%
	Ammonium Fluoride	2/3%
	Sodium Fluoride	10/14%
	Potassuim Fluoride	
	Water	Balance

4.7 The waste is checked for pH during neutralization to render it noncorrosive. The waste is analyzed at least once a year. The waste is sampled at all depths with a straight glass sampling tube.

5. 1,1,1 Trichloroethane - EPA Number F002
(DOT UN2831 ORM-A)

5.1 1,1,1 trichloroethane is used as a solvent to degrease tubing by immersion. The solvent is continuously cleaned by distillation. The waste represents still bottom.

5.2 Waste is contained in 50 gallon drums and is sold for reclaiming at two to three month intervals. Yearly volume is 800/1300 gallons.

5.3 This waste is toxic and is composed of 40-60% 1,1,1 trichloroethane and the balance is tramp oils. No on site analyses are made.

6. Kerosene & Mineral Spirits - EPA Number NA
(DOT UN1223; Combustible Liquid) (DOT UN1256; Combustible Liquid)

6.1 These solvents are used for machinery parts cleaning.

6.2 Waste is contained in 50 gallon drums and is sold for reclaiming every two to three months. Yearly volume is 300/400 gallons.

6.3 This waste is toxic and is composed of 60-80% solvent and the balance tramp oils and sludge.

VI MAJOR WASTE MANAGEMENT DEVICES USED AT THIS FACILITY

1. Steel Drums - 55 Gallon Capacity

1.1 Steel drums are used to store waste 1,1,1 trichloroethane, kerosene, and mineral spirits. These wastes are compatible; however they are stored in separate drums.

1.2 Drums are stenciled with the name of the waste, and labeled when full. "Flamable Liquid" labels are attached to drums containing kerosene and mineral spirits waste. "Hazardous Waste" labels are attached to all wastes in drums.

1.3 Drums containing wastes are stored in cement block and concrete impounds. Outlets to impounds are 4" pipe sealed with a pipe cap. Impounds will store up to a 24 hour, eight inch rainfall plus the contents of the largest waste container within the impound. All ground water drains away from impounds toward curbing which drains off the water.

1.4 Three drums used to collect wastes are stored on pallets in a 170 gallon capacity impound. When full they are transferred to a 1100 gallon impound to await disposal. No more than 20 drums of waste will be stored at one time. Normally, no more than 10 drums are stored. Impound areas are located at the building exterior at the southern end as shown in Figures 1 through 6 in Section II.

2. Storage Tanks - Two each; 200 gallon capacity.

2.1 Two welded, reinforced, 1/4 inch thick, unlined, steel tanks are used for storage of waste oil and alkaline waste solution. These tanks are within a 3700 gallon impound of cement block and concrete construction, separate from drum storage impounds. Wastes within this impound are compatible. Each tank has a painted waste identification label.

2.2 Dimensions of each tank are 31" wide X 36" wide X 45" deep. Tanks are accessible only through a top hinged door. No piping, valves, direct feed system, drain system or interconnecting systems are attached to these tanks. Tanks are emptied by vacuum hose to a tank truck.

2.3 Waste oil (specific gravity 1.1-1.4) and alkaline waste (specific gravity 1.08-1.2) are noncorrosive to carbon steel.

2.4 No vapor control systems are provided except for covers over the access hole.

2.5 The waste tanks sit on a concrete base near ground level. There are no other tanks in the impound which are not elevated. As such, other tanks would not be affected by leaking waste tank.

2.6 The impound can contain up to a 24 hour, eight inch rainfall plus the contents of a 200 gallon waste container as a minimum. Ground water drains away from the impound toward curbing sloped to provide runoff.

2.7 In the event of leakage, the waste can be removed by vacuuming to a truck or container. Alternately, the waste could be with drawn through a 4" pipe, normally capped to prevent drainage.

2.8 Leaking wastes are easily identifiable. Oil by its appearance and texture and alkaline cleaner by pH.

3. Process/Treatment Tanks

3.1 Three indoor tanks containing acid mixes are used to treat tubing during manufacturing. When the solutions are spent they are neutralized within the process tank with ammonia prior to vacuuming to a tank truck for disposal. Disposal occurs within 72 hours of neutralization.

3.2 No process tank contains a drain nor inlet, outlet or interconnecting piping. All tanks are charged with concentrated chemicals from drums and water from a hose.

3.3 Mixed acid tanks for metal cleaning are welded construction, 1/2 reinforced steel plate. Tanks are lined with 1/2" polypropulence sheeting, seam welded. The shorter of the two tanks has an additional 6" layer of carbon brick on the bottom of the tank. Tank inside dimensions are 33" wide X 33" deep X 34.5 feet long. Tanks sit 7 to 10" off the concrete floor. These tanks contain 1700 and 1500 gallons of solution, respectively. Acid solutions are noncorrosive to liners.

3.4 The third tank contains mixed acid solutions for surface coating titanium tubing. This tank is reinforced wood construction with a 40 mil PVC plastic liner. Dimensions are 22" deep X 22" wide X 27 feet long. This tank contains up to 200 gallons of solution. The chemical solution is noncorrosive to the liner.

4. Treatment of Wastes

4.1 Spent acid solutions are neutralized with ammonia according to Trent Process Control Standard PCS-016F Supplement III. (Pages 6-4 & 6-5)

ACID NEUTRALIZATION

1. SCOPE

1.1 This procedure is to be followed for spent acid neutralization with anhydrous ammonia.

2. SPENT ACID

2.1 Spent acid is a mixture of 12-20% nitric acid and 2-5% hydrofluoric acid (by weight) plus metallic ions and salts resulting from passivation and pickling of stainless steels.

2.2 The acid is spent when it no longer removes light oxides on stainless steel tubing or when the iron salt content reaches .04 grams per milliliter of solution.

3. SAFETY PRECAUTIONS

3.1 Acid burns can be severe and painful. If you come in contact with acid, flush the area with large quantities of water. Seek medical help immediately after water flushing if critical areas of the body are exposed or after contact with undiluted hydrofluoric acid.

3.2 Wear protective, rubberized clothing and a face shield when working with unneutralized acid.

3.3 Check that the safety shower and eye wash fountain work properly and that your path to them is not blocked.

4. NEUTRALIZATION PROCEDURE

4.1 Liquid anhydrous ammonia is piped from its storage tank to a stainless steel perforated distribution line placed in the bottom of the acid tank. The distribution line will extend the length of the tank.

4.2 The ammonia flow is controlled by valves at the storage tank and just prior to entry to the acid tank. The flow will be restricted such that excessive heat is not produced, ammonia does not escape to the atmosphere, and the neutral point is not exceeded.

4.3 The neutralization process is to be monitored:

4.3.1 Temperature may not exceed 140°F to avoid deterioration of the tank liner.

4.3.2 The pH must be monitored. The pH increases from about 2, highly acid, to 7, the neutral point. Soda ash can be sprinkled on the acid to check the neutral point. When the soda ash no longer reacts with the solution, the neutral point is close or has been exceeded. Litmus paper obtained from the lab can also be used to determine the pH.

4.3.3 When the neutral point is reached turn off the ammonia control valve and check the stage of neutralization with the pH meter in the Laboratory. The pH must be between 6 and 8, 7 being the exact neutral point. If below 6, continue adding ammonia slowly until the pH is between 6 and 8.

Prepared By: Harry L Murphy Date: 3-12-80
Manager of Quality Assurance

VII FACILITY EQUIPMENT AND DEVICES

1. Waste Loading Equipment

1.1 Fork truck equipped with a boom for drum loading. The fork truck has a cage for driver protection from falling objects.

1.2 Vacuum trucks for loading bulk liquid wastes are provided by outside haulers.

2. Safety & Emergency Equipment

(See map of equipment locations on next page.)

2.1 Safety and emergency equipment available to employees include:

(a) Goggles and face shield located at work stations.

(b) Rubberized suits, gloves and boots available from Maintenance.

(c) Seventeen Class 10BC carbon dioxide or Class 10ABC dry chemical fire extinguishers are located throughout the plant and office, three of which are located within 100 feet of waste storage areas.

(e) One Scott Air-Pak II self contained breathing system stored in the Laboratory.

(f) Two air masks with air supplied from compressed air lines located throughout the plant, are available in the maintenance area.

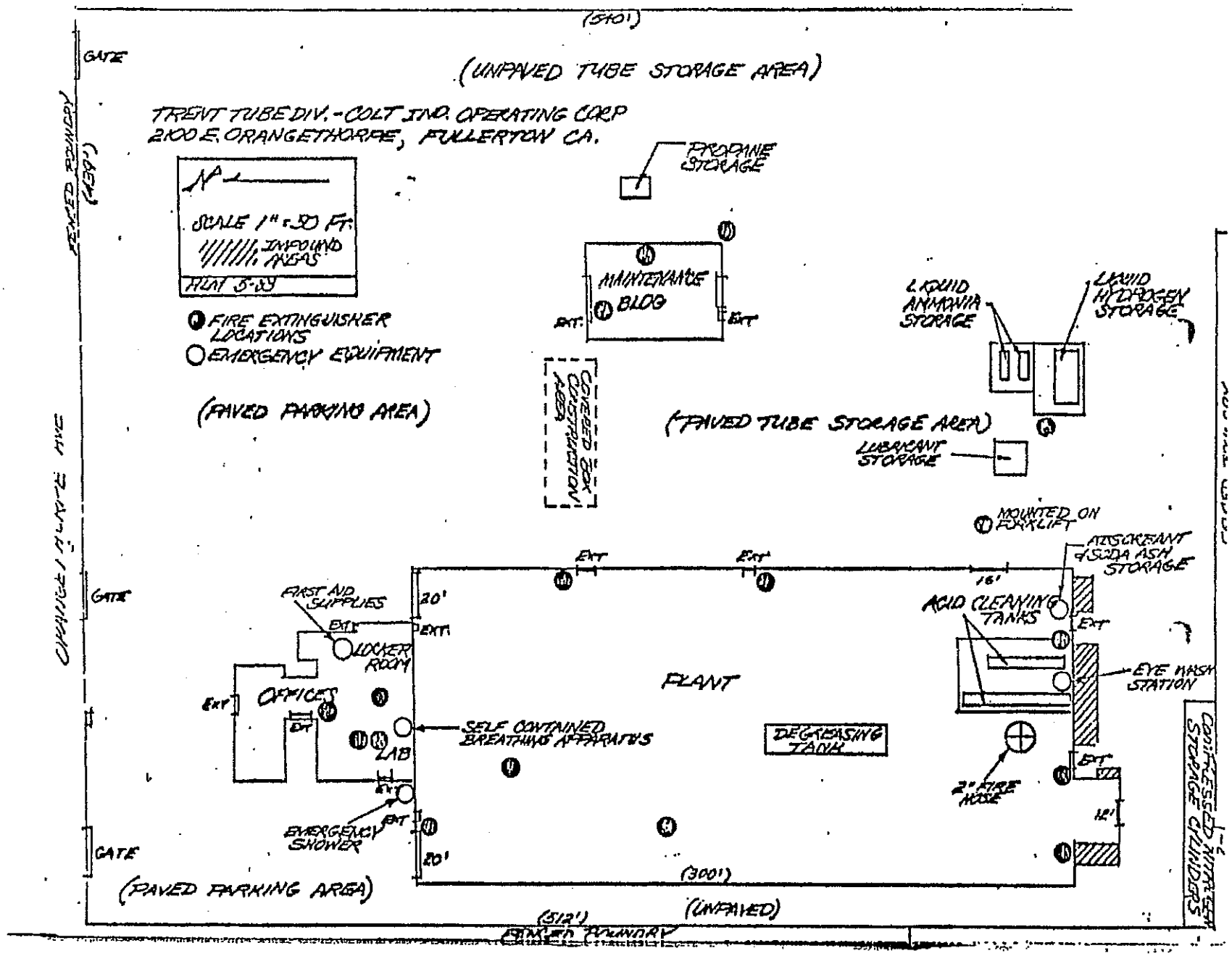
(g) An eyewash station and rinse water tank are located near to process tanks in which spent acids are neutralized.

(h) First aide supplies are located in the washroom.

(i) A telephone is located inside near the process tanks for summoning help if needed.

(j) Emergency shower is located just outside the Laboratory.

(k) Soda ash and absorbent materials are stored inside the plant in the southeast corner.


(510')
GATE
(UNPAVED TUBE STORAGE AREA)
TRENT TUBE DIV. - COLT IND. OPERATING CORP
2100 E. ORANGETHORPE, FULLERTON CA.
SCALE 1" = 30 FT.
IMPOUND AREAS
PLOT 5-39
FIRE EXTINGUISHER LOCATIONS
EMERGENCY EQUIPMENT
PROPANE STORAGE
MAINTENANCE BLDG
EXT.
EXT.
LIQUID AMMONIA STORAGE
LIQUID HYDROGEN STORAGE
COVERED CONSTRUCTION AREA
(PAVED PARKING AREA)
(PAVED TUBE STORAGE AREA)
LUBRICANT STORAGE
MOUNTED ON FORKLIFT
ATTACHMENT FOR SODA ASH STORAGE
EXT
EXT
16'
GATE
FIRST AID SUPPLIES
EXIT
20'
EXIT
LOCKER ROOM
ACID CLEANING TANKS
EXT
OFFICES
EXT
EXT
PLANT
EYE WASH STATION
SELF CONTAINED BREATHING APPARATUS
LAB
DEGREASING TANK
2" FIRE HOSE
EXT
EMERGENCY SHOWER
EXT
12'
GATE
20'
(300')
(PAVED PARKING AREA)
(UNPAVED)
(512')
COMPRESSED NITROGEN STORAGE CYLINDERS

CRU 00206

3. Security

3.1 Trent Tube property is protected by a six foot chainlink fence around its perimeter. Access is through three gates wide enough to admit trucks and one personnel gate. All but one truck gate are locked at all times except under special circumstances. All gates are locked when the facility is unattended.

3.2 Warning signs are posted in hazardous waste areas. Signs read in English and Spanish. Wording is "Caution - Hazardous Waste area - Unauthorized Persons Keep Out". Size is 14" X 20".

3.3 Silent alarms protect all buildings from entry when the plant is closed.

4. Lighting

4.1 Hazardous waste areas are lighted; however, hazardous waste are not handled during darkness.

4.2 Outdoor lights are sodium vapor type and are located above waste accumulation areas. Indoor lights are fluorescent and sodium vapor located above process tanks.

5. Water Supply

5.1 Water supplies are not required for waste storage or treatment. Water is used only to rinse storage or process tanks when wastes are vacuumed to a tank truck. This usage is minimal.

5.2 No water piping connects directly to waste tanks. There are hose spigots from which garden hoses can be connected for rinsing.

5.3 All water is potable tap water.

VIII OPERATIONAL PROCEDURES

1. Control of Hazardous Wastes in General

1.1 Wastes are under the control of the Manager of Quality Assurance or Maintenance Superintendent.

1.2 Each waste stream is collected in separate containers. Each container location is marked with the waste to be accumulated and/or stored at that location. Each container is also marked with the waste name.

1.3 None of the wastes generated at this facility are incompatible. They are stored in separate containers because some can be recycled and the others may be eventually be recyclable.

1.4 Waste drums are sealed when full to prevent emissions and prevent a fire hazzard. Waste tanks are also closed with hinged lids.

1.5 Waste storage area isles are kept clear to allow for entry of emergency equipment.

1.6 Empty contaniers contaminated with hazardous waste are stored in impound areas and treated as hazardous waste.

1.7 Twice weekly inspections of waste storage and process areas are performed by the Manager of Quality Assurance or his designated representative. These inspections insure proper placement of waste, labeling, container closure, waste levels and a check for leaks. See Environmental Check List on the next page.

1.8 Inspection reports will be retained at this facility for a period of three years.

2. Training

2.1 The Manager of Quality Assurance has overall responsibility for waste control. He attended a seminar, "Hazardous Materials & Waste Management/Compliance". Records of outside training are retained for a minimum of three years.

2.2 No single person is engaged in waste control, treatment or any other related operations. Training is by way of posted notices and on-the-job instruction while being supervised by the Manager of Quality Assurance and/or Maintenance Superintendent during neutralization treatment or loading of wastes for disposal.

2.3 Personnel are instructed in safety procedures, pH measurements, and loading procedures while on-the-job. No records are made of this training.

ENVIRONMENTAL CHECK LIST

Indicate with a (✓) if inspection was performed and conditions are satisfactory. Place and (x) when conditions are unsatisfactory. An (x) requires an explanation and corrective action, immediately if the condition is serious. Notify the Manager of Quality Assurance and Maintenance Superintendent of action needed.

1. Pickle Area

1.1	Leaks in tank	___	1.4	Liquid levels	___
1.2	Overheated	___	1.5	AQMD permit posted	___
1.3	Eyewash station clear	___			

2. Degreasing

2.1	Still operating properly	___	2.3	Proper level in tank	___
2.2	Leaks in sump	___	2.4	AQMD permit posted	___

3. Doping Rack

3.1	Reservior covered	___	3.3	AQMD permit posted	___
3.2	Reservior free of leaks	___			

4. Outside Impounds

4.1	Chloroethane VG tanks free of leaks	___
4.2	Chloroethane VG tank valves locked	___
4.3	Condition of Solvo-Clean waste tank and waste level	___
4.4	Condition of waste oil tank and waste level	___
4.5	Kerosene storage tank condition	___
4.6	Drums in impounds elevated	___
4.7	Condition of waste drums (leaks)	___
4.8	Waste levels in collection drums	___
4.9	Drums properly labeled	___
4.10	Drum bungs on tight	___
4.11	Pipe caps are tight on outlets to impounds	___
4.12	AQMD permits posted on chloroethane VG storage tanks	___

5. General Waste Storage Area

5.1	No waste drums are sitting in yard
5.2	Isles are clear for emergency equipment

COMMENTS:

INSPECTOR_____ DATE_____

IX PERSONNEL

1. Training

1.1 Employees will be trained in first aid, fire protection and the Emergency/Contingency Plan every two years.

1.2 Representatives from each plant shift and office personnel will be trained in first aid.

1.3 All personnel will be trained in fire protection.

1.4 Foremen, the designated Emergency Coordinator, and Secondary Emergency Coordinators shall be trained in carrying out the Emergency/Contingency Plan.

1.5 See Section VIII for additional training and personnel information.

XI ENVIRONMENTAL CONTROL PERMITS

1. South Coast Air Quality Management District
(ID Number - 006513)

1.1 Permit Number	Operating Equipment
670019	Degreaser
001486	Scrubber
S00926	Storage Tank - 4000 Gallons
S00926	Storage Tank - 1400 Gallons
S03878	Flowcoater

2. County Sanitation District of Orange County
(ID Number - 21278)

2.1 Permit Number - 2-278

3. Orange County Health Care Agency - Environmental Health

3.1 Permit Number - 22-83274

4. California Department of Health Services

4.1 California extremely hazardous waste disposal permit number - 3-3966.

XII RECORDS & REPORTS

1. Maintenance

1.1 Records and reports involving wastes shall be maintained at Trent Tube for a period of three years from the date of inception or last use.

2. Content

2.1 Records and reports shall include:

2.1.1 Inspection Reports
2.1.2 Permits
2.1.3 Waste manifests when disposal occurs.
2.1.4 Incident Reports
2.1.5 Closure Plans
2.1.6 Contingency Plans
2.1.7 Waste Analyses
2.1.8 Reports of accidents involving wastes.
2.1.9 Waste acid neutralization procedure.

3. Control

3.1 Records and reports are under the control of the Manager of Quality Assurance. He is responsible for maintenance and retention.

4. Availability

4.1 Records are available for inspection by the Department of Health Services.